

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil No. 1:11-cv-01083-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

Civil No. 1:14-cv-01611-RMB-KMW

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

Civil No. 1:15-cv-01876-RMB-KMW

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

**JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR
THE SUBSTITUTION OF PLAINTIFF LINDA RUSSELL WITH HER BENEFICIARY
COURTNEY RUSSELL**

WHEREAS, Linda Russell is one of several Plaintiffs in this case;

WHEREAS, on March 2, 2016, Plaintiffs filed a Statement Noting the Death of Plaintiff Linda Russell (Dkt. No. 179);

WHEREAS, prior to her death, Plaintiff Linda Russell was prosecuting claims on behalf of certain Hartford mutual funds;

WHEREAS, Linda Russell's daughter, Courtney Russell, is a beneficiary of Linda Russell's account;

WHEREAS, the parties agree that upon completion of the transfer of the shares in the Hartford mutual funds in Linda Russell's account of which Courtney Russell is a beneficiary, to Courtney Russell, pursuant to Fed. R. Civ. P. 25, Courtney Russell should be substituted as a Plaintiff in place of Linda Russell;

WHEREAS, unless an extension is provided by the Court, the 90 day deadline under Fed. R. Civ. P. 25, for filing for substitution is set to expire on May 31, 2016;

WHEREAS, Defendants and Plaintiffs are in the process of having the shares in the Hartford mutual funds in Linda Russell's account, of which Courtney Russell is a beneficiary, transferred to Courtney Russell;

WHEREAS, while the process to transfer the shares in Linda Russell's account to Courtney Russell is on-going, the parties are unsure whether the actual transfer will be completed by May 31, 2016, but should be completed sometime shortly thereafter; and

WHEREAS, subject to approval of the Court, the parties agree that the deadline for filing for substitution of Courtney Russell as a Plaintiff in place of Linda Russell, is extended from May 31, 2016, to July 15, 2016;

NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. Plaintiffs shall have until July 15, 2016 to file for substitution of Courtney Russell as a Plaintiff in place of Linda Russell.

Dated: May 17, 2016

By: /s/ Robert L. Lakind
Robert L. Lakind
SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
Tel: (609) 275-0400
Fax: (609) 275-4511

Robin F. Zwerling
Andrew W. Robertson
ZWERLING, SCHACHTER
& ZWERLING, LLP
41 Madison Ave, 32nd Floor
New York, NY 10010
Tel: (212) 223-3900
Fax: (212) 371-5969
Attorneys for Plaintiffs

Respectfully submitted,

By: /s/ Anthony J. Sylvester
Anthony J. Sylvester
SHERMAN WELLS SYLVESTER
& STAMELMAN LLP
210 Park Avenue, 2nd Floor
Florham Park, NJ 07932
Tel: (973) 302-9700
Fax: (973) 845-2546

Sean M. Murphy
Robert C. Hora
MILBANK, TWEED,
HADLEY & McCLOY, LLP
28 Liberty Street
New York, NY 10005
Tel: (212) 530-5170
Fax: (212) 822-5170
Attorneys for Defendants

SO ORDERED.

_____, 2016

Hon. Renee Marie Bumb
United States District Court Judge